

MELLINGER, SANDERS & KARTZMAN, LLC  
101 Gibraltar Drive, Suite 2F  
Morris Plains, New Jersey 07950  
Tel. (973) 267-0220  
Steven P. Kartzman, Esq.  
Adam G. Brief, Esq.  
*Attorneys for Steven P. Kartzman,  
as Chapter 7 Trustee*

In re:  GILBERT L. GREENSTEIN AND RISA GREENSTEIN,  Debtors.	UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY  CHAPTER 7  CASE NO.: 13-26231 RG  The Honorable Rosemary Gambardella  HEARING DATE: See Order Shortening Time  <b>Oral Argument Requested Only If Opposition Timely Filed &amp; Served</b>
---	--

**NOTICE OF CHAPTER 7 TRUSTEE'S APPLICATION IN  
SUPPORT OF MOTION FOR AN ORDER (I) APPROVING  
PRIVATE SALE OF PROPERTY OF THE ESTATE  
FREE AND CLEAR OF LIENS, CLAIMS AND INTERESTS  
PURSUANT TO 11 U.S.C. § 363; (II) WAIVING 14 DAY STAY  
OF ORDER; AND (III) GRANTING RELATED RELIEF**

TO: ALL PARTIES ON ANNEXED SERVICE LIST

PLEASE TAKE NOTICE that on a date and time to be set by the Bankruptcy Court, the Chapter 7 Trustee, Steven P. Kartzman, by and through his attorneys, Mellinger, Sanders & Kartzman, LLC, will apply to the United States Bankruptcy Court, Martin Luther King, Jr. Federal Building, 50 Walnut Street, 3<sup>rd</sup> Floor, P.O. Box 1352, Newark, New Jersey 07101-1352, the Honorable Rosemary Gambardella presiding, for an Order (i) Authorizing the Private Sale of

Property of the Estate Free and Clear of Liens, Claims and Interests Pursuant to 11 U.S.C. § 363; (ii) Waiving 14 Day Stay of Order; and (iii) Granting Related Relief (the "Motion").

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the Court to enter an Order authorizing the Trustee to conduct a sale of property of the estate, specifically all of the estate's right, title and interest in RX Initiative LLC, free and clear of all liens, claims and interests pursuant to 11 U.S.C. § 363, and granting the other relief requested, or if you want the Court to consider your views on the motion or if you want to make a higher or better offer to purchase the aforementioned property, then you or your attorney must file with the Court a written response explaining your position. Such a request must: (a) be in writing; (b) state with particularity the basis of your objection or the terms of your higher and better offer; and (c) be filed with the Court at the following address:

Clerk, United States Bankruptcy Court  
Martin Luther King Jr. Federal Building  
50 Walnut Street, 3<sup>rd</sup> Floor  
P.O. Box 1352  
Newark, New Jersey 07101-1352

If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it in by the deadline set forth in the Order Shortening Time.

You must also mail a copy to:

Mellinger, Sanders & Kartzman, LLC  
Attn.: Steven P. Kartzman, Esq.  
101 Gibraltar Drive, Suite 2F  
Morris Plains, New Jersey 07950  
*Attorneys for Trustee*

*and to the*

Office of the United States Trustee  
One Newark Center, Suite 2100  
Newark, New Jersey 07102

In support of this motion, the Trustee shall rely on the Application in Support of the Motion, submitted herewith, the Exhibits annexed thereto, and the arguments of counsel, if any. A Statement as to Why No Brief is Necessary and proposed form of Order are also being submitted herewith.

Oral argument is hereby requested.

**MELLINGER, SANDERS, KARTZMAN, LLC**  
*Attorneys for Trustee*

By: /s/ Steven P. Kartzman  
Steven P. Kartzman

Dated: January 8, 2014

**STATEMENT AS TO WHY NO BRIEF IS NECESSARY**

By this Application, the Trustee seeks an Order (i) Authorizing the Private Sale of Property of the Estate Free and Clear of Liens, Claims and Interests Pursuant to 11 U.S.C. § 363; (ii) Waiving 14 Day Stay of Order; and (iii) Granting Related Relief. The issues before the Court are whether there are grounds to authorize a sale of property of the estate, and to grant the related relief sought therein. The law is well settled, and therefore no brief is required.

**MELLINGER, SANDERS, KARTZMAN, LLC**  
*Attorneys for Trustee*

By: /s/ Steven P. Kartzman  
Steven P. Kartzman

Dated: January 8, 2014

Service List

Stephen B. Ravin, Esq.  
Saul Ewing, LLP  
One Riverfront Plaza, Suite 1520  
Newark, New Jersey 07102-5426  
*Attorneys for Lexicon Investments LLC*

William C. Soukas, Esq.  
Nowell Amoroso Klein Bierman, P.A.  
155 Polifly Road  
Hackensack, New Jersey 07601  
*Attorneys for RX Initiative, LLC & GRX Holdings, LLC*

Christopher P. Massaro, Esq.  
Cole, Schotz, Meisel, Forman & Leonard, P.A.  
25 Main Street  
Court Plaza North  
Hackensack, New Jersey 07602-0800  
*Attorneys for Lawrence Margolis and Link Asset Management, LLC*

Martin Margolis, Esq.  
The Margolis Law Firm  
Five Becker Farm Road  
Roseland, New Jersey 07068  
*Attorneys for Debtors*

Adam Medici  
203 Washington Street  
Hoboken, New Jersey 07030  
*Interested Party*